

Office Of River Protection P.O. Box 450, MSIN H6-60

Richland, Washington 99352

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AUG 2 0 2007

07-ESQ-136

Ms. Jane A. Hedges, Program Manager Nuclear Waste Program Washington State Department of Ecology 3100 Port of Benton Blvd. Richland, Washington 99354



Dear Ms. Hedges:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION NOTIFICATION FORM 24590-PTF-PCN-ENV-07-005

Reference: WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource

Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of

Dangerous Waste, Part III, Operating Unit 10, 'Waste Treatment and

Immobilization Plant."

This letter submits the Hanford Facility RCRA Permit Modification Notification Form 24590-PTF-PCN-ENV-07-005 (Attachment 1) for the Washington State Department of Ecology (Ecology) review and approval. The form describes a requested Class 1 modification to the Reference related to the Pretreatment Facility (PTF) at the Waste Treatment and Immobilization Plant. A Bechtel National, Inc. certification statement is provided in Attachment 2.

Permit Modification Notification Form 24590-PTF-PCN-ENV-07-005 updates the PTF General Arrangement Plan at the 77' elevation found in Appendix 8.4 of the Reference and includes an updated room and equipment list for elevation 77'. A one-to-one correlation between permit versions and source drawings does not exist. Potential permit affecting changes between the current and previous revisions of the source drawings on the permit change notice form are • briefly described in a summary format.

This modification request was discussed in advance with your staff.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Office of Environmental Safety and Quality, (509) 376-7828.

Sincerely,

Shirley J/Ohnger, Acting Manager

Office of River Protection

ESQ:GMN

Attachments: (2)

cc w/attachs:

Administrative Record BNI Correspondence Environmental Portal, LMSI

cc electronic:

J. Brown, BNI

W. S. Elkins, BNI

B. G. Erlandson, BNI

P. A. Fisher, BNI

J. S. Hill, BNI

S. Murdock, BNI

P. Peistrup, BNI

B. Becker-Khaleel, Ecology

R. K. Biyani, Ecology

E. A. Fredenburg, Ecology

B. Speer, Ecology

S. A. Thompson, FHI

A. C. McKarns, RL

D. J. Sommer, SCS

cc w/o attachs:

D. A. Klein, BNI

J. Cox, CTUIR

S. Harris, CTUIR

L. Cusack, Ecology

S. L. Dahl, Ecology

G. P. Davis, Ecology

G. Bohnee, NPT

K. Niles, Oregon Energy

R. Jim, YN

Attachment 1 07-ESQ-136

Hanford Facility RCRA Permit Modification Notification Form 24590-PTF-PCN-ENV-07-005

Hanford Facility RCRA Permit Modification Notification Form Part III, Operating Unit 10

Waste Treatment and Immobilization Plant

Index

Page 2 of 3:

Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant Update Pretreatment Facility General Arrangement Plan at the 77' elevation in Appendix 8.4 of the Dangerous Waste Permit.

Submitted by Co-Operator:

1 V /

Reviewed by ORP Program Office:

Date

| Hanford Facility RCRA Permit Modification Notification Form | | | |
|---|-----------------------------|--|--|
| Unit: | Permit Part & Chapter: | | |
| Waste Treatment and Immobilization Plant | Part III, Operating Unit 10 | | |

Description of Modification:

The purpose of this Class 1 prime modification is to update Pretreatment Facility General Arrangement Plan at the 77' elevation in Appendix 8.4 of the Dangerous Waste Permit. The following General Arrangement Drawing is submitted to replace the permitted General Arrangement Drawing currently in Appendix 8.4.

| Appendix | 8.4 | | |
|----------|---------------------------------|-------|---------------------------------|
| Replace: | 24590-PTF-P1-P01T-P0004, Rev. 0 | With: | 24590-PTF-P1-P01T-00004, Rev. 3 |

This modification requests Ecology approval and incorporation into the permit the specific changes to the General Arrangement Drawing that are identified by the Revision 2 and 3 notes, clouds, and revision triangles shown on the General Arrangement Drawings that have been issued since the last revision of the permitted version. Revisions are the result of ongoing design. The following is a summary of the significant changes on the attached drawing:

- Relocated equipment within and between rooms
- Added new rooms and adjusted the boundaries of rooms
- · Added, adjusted, and relocated racks
- Added and removed holds
- · Added component identification numbers for skids relative to equipment
- Various changes to the depiction of equipment/structure
- Identification of additional information as a result of going from permit drawing to the engineering design drawing

An updated Pretreatment Facility room and equipment list for the 77' elevation is also included.

The following is a list of outstanding change documents that have not been incorporated into this modification:

None

| WAC 173-303-830 Modification Class: 1 2 | Class 1 | Class ¹ 1 | Class 2 | Class 3 |
|---|---------|----------------------|---------|---------|
| Please mark the Modification Class: | | Х | | |

Enter Relevant WAC 173-303-830, Appendix I Modification citation number:

N/A

Enter wording of WAC 173-303-830, Appendix I Modification citation:

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class ¹1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

24590-SENV-F00011 Rev 12 (6/18/2007)

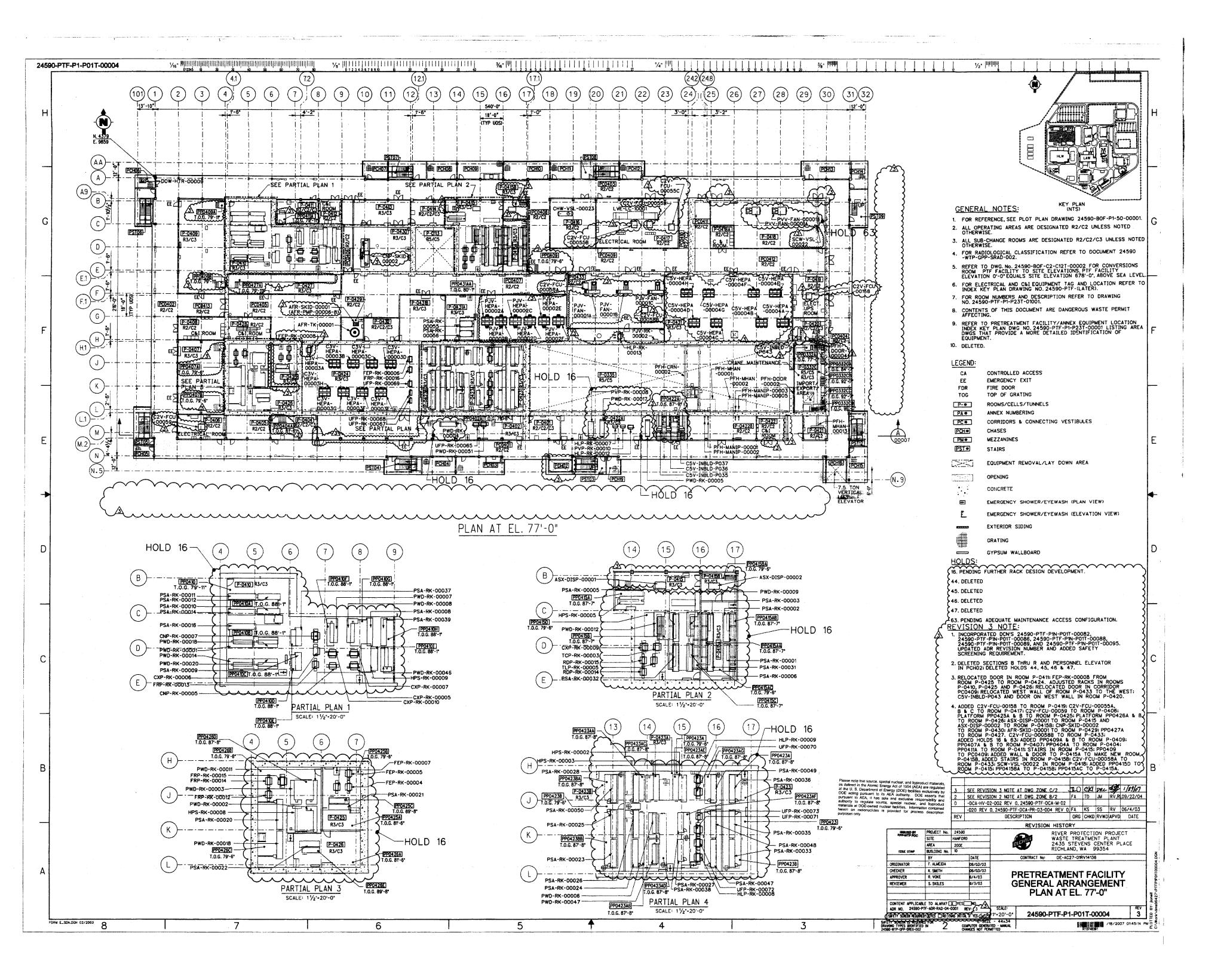
¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

Date

B. Becker-Khaleel

| Quarter Ending | September 30, 2007 | | 24590-PTF-PCN-ENV-07-005 | |
|-----------------|-----------------------|------------------------------|--------------------------|--|
| Modification Ap | · <u> </u> | No (state reason for denial) | Reviewed by Ecology: | |



Pretreatment Facility Room and Equipment List for El. 77'

| Room | Room Description | Equipment Number | Equipment Description |
|--------------|--------------------------------|------------------|---|
| | MIS | CELLANEOUS UNITS | |
| P-0418 | Vessel Vent Exhaust Fan Room | PVV-FAN-00001A | PVV Exhaust Fan |
| | | PVV-FAN-00001B | PVV Exhaust Fan |
| P-0430 | CNP Evaporator Condenser Room | CNP-HX-00002 | Cesium Evaporator Primary Condenser (located on CNP-SKID-00002) |
| | | CNP-HX-00003 | Cesium Evaporator Intercondenser (located on CNP-SKID-00002) |
| | | CNP-HX-00004 | Cesium Evaporator Aftercondenser (located on CNP-SKID-00002) |
| P-0431A | PJV Secondary HEPA Filter Room | PJV-HEPA-00002A | PJV Secondary Exhaust HEPA Filter |
| | | PJV-HEPA-00002B | PJV Secondary Exhaust HEPA Filter |
| | | PJV-HEPA-00002C | PJV Secondary Exhaust HEPA Filter |
| | | PJV-HEPA-00002D | PJV Secondary Exhaust HEPA Filter |
| | | PJV-HEPA-00002E | PJV Secondary Exhaust HEPA Filter |
| | | PJV-HEPA-00002F | PJV Secondary Exhaust HEPA Filter |
| P-0433 | PJV Fan Room | PJV-FAN-00001A | PJV Exhaust Fan |
| | | PJV-FAN-00001B | PJV Exhaust Fan |
| | | PJV-FAN-00001C | PJV Exhaust Fan |

Revised: 1/17/2007

Pretreatment Facility Room and Equipment List for El. 77'

| Room | Room Description | Equipment Number | Equipment Description | | |
|---------|---|--------------------|---|--|--|
| | TANK AND MISCELLANEOUS UNIT ANCILLARY EQUIPMENT | | | | |
| | TANK AND MISCELL | ANEOUS UNIT ANCILL | | | |
| P-0113 | Reserved Space (TBD) | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0335 | Filter Cave | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0402 | Rack Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0407 | Process Area | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0410 | Rack Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0411 | Sub-Change Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0415 | Rack Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0415A | Rack Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0422A | Inbleed Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0423 | Rack Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0426 | Rack Room | N/A | Does not contain any regulated tanks or MTUs, but does contain regulated ancillary equipment (valves, piping, etc.) | | |
| P-0430 | CNP Evaporator Condenser Room | CNP-EJCTR-00010A | 2nd Stage Primary Vacuum Ejector (located on CNP-SKID-00002) | | |
| | | CNP-EJCTR-00010B | 2nd Stage Secondary Vacuum Ejector (located on CNP-SKID-00002) | | |
| | | CNP-PMP-00002 | Process Condensate Return Pump (located on CNP-SKID-00002) | | |

Revised: 1/17/2007

Pretreatment Facility Room and Equipment List for El. 77'

| Room Room Description Equ | uipment Number | Equipment Description |
|--|----------------|---|
| CONTAIN | MENT BUILDING | S |
| P-0431A PJV Secondary HEPA Filter Room | N/A | Contains Permitted Equipment Identified Above |

Revised: 1/17/2007

Attachment 2 07-ESQ-136

Bechtel National, Inc. Certification Statement

Bechtel National, Inc. Certification

The following certification statement is provided consistent with Contract No. DE-AC27-01RV14136, Section H.26, Environmental Permits, paragraph (g) for the submittal of the Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-PTF-PCN-ENV-07-005.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

W. S. Elkins

Project Director

6-AUG-2007

Date